

August 16, 2005

From: Craig Minowa
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To: Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW Room 4008
So. Ag. Stop 0268
Washington, DC 20250

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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. The Organic Consumers Association, a nonprofit consumer watchdog organization with 650,000 supporters requests the following:

Section 205.601 (a) (205.605(b) of the National List discusses the allowance of **calcium hypochlorite** as a disinfectant in organic crop production. Other chlorine based sanitizers currently allowed are **sodium hypochlorite** and **chlorine dioxide**. The National list stipulates that residual levels of chlorine should not exceed the residual disinfectant limit under the Safe Drinking Water Act. It does not discuss at what time those residual levels should be measured. This is problematic in that high levels of chlorine based sanitizers are being used with the assumption that they will dilute to allowable residual levels by the time they are tested or by the time the product reaches the consumer's dinner table. This is inconsistent with the organic standards since most conventional synthetic pesticides could also meet such a lax regulation (i.e. being detectable at trace levels on produce at point of purchase). It should be specifically stipulated that chlorine based sanitizing solutions be measured for residual strength immediately following application to the food product, and that residual strength, at that point in time, must not surpass the disinfectant limit under the Safe Drinking Water Act.

Lecithin bleached (205.605b) **Lecithin unbleached** (205.606) – When the National List was originally created, organic soy lecithin was not readily available. It is now available and therefore should be removed from the list. Some members of industry argue that it is not available in high enough quantities, but that is simply because it is currently more affordable to purchase nonorganic lecithin, and since conventional lecithin meets the NOP regulations, few business are pursuing the organic option. There will be no market for organic soy lecithin if conventional lecithin continues to be allowed on the National List. Once lecithin is removed from the list, the demand will create a supply, while fueling the transition towards organic soybean production vs. conventional.

Glycerin 205.605(b) – All allowed glycerin should be made from natural materials (produced by hydrolysis of naturally derived fats and oils). Glycerin not made from plant or animal oils should not be allowed.

Citric, lactic and alginic acids can be produced by natural fermentation to produce organic acids. This stipulation should be added to their listings (i.e. cannot be produced from genetically modified organisms)

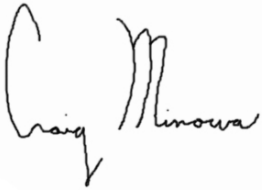
Calcium carbonate: Naturally occurring calcium carbonate should be allowed while chemically produced calcium carbonate should not.

Enzymes: Specifically, GMO enzymes should not be allowed.

Ethylene is not a necessary synthetic, as it is only used for post-harvest ripening, a method of “organic” food production that most consumers would deem unnecessary. Natural ripening is in alliance with the spirit of organic farming, not chemically induced ripening for the sake of synthetically creating higher yields or facilitating long distance shipping practices.

Thank you for your hard work in building a healthy and sustainable future for farmers, food manufacturers and consumers.

Sincerely,

A handwritten signature in black ink that reads "Craig Minowa". The signature is fluid and cursive, with the first name "Craig" and the last name "Minowa" clearly distinguishable.

Craig Minowa
Environmental Scientist
Organic Consumers Association
<http://www.organicconsumers.org>

